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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LANDA-RODRIGUEZ, et al.,  
[#2-GABRIEL ZENDEJAS-CHAVEZ]

Defendants.

No. 2:18-CR-00173(A)-GW-2

[PROPOSED] STATEMENT OF THE CASE

Trial Date: August 2, 2022  
Trial Time: 8:30 a.m.  
Location: Courtroom of the  
Honorable George H.  
Wu

Plaintiff United States of America, by and through its counsel  
of record, the United States Attorney for the Central District of  
California and Assistant United States Attorneys Shawn J. Nelson,

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Gregory Bernstein, Keith D. Ellison, and Gregg E. Marmaro  
hereby submits this Proposed Statement of the Case.

Dated: July 24, 2022

Respectfully submitted,

STEPHANIE S. CHRISTENSEN  
Acting United States Attorney

SCOTT M. GARRINGER  
Assistant United States Attorney  
Chief, Criminal Division

/s/

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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

**STATEMENT OF THE CASE**

The First Superseding Indictment ("Indictment") charges defendant Gabriel Zendejas-Chavez ("defendant") with violations of federal criminal law. The Indictment is not evidence. Defendant has entered a plea of not guilty to each of the charges against him.

The Indictment alleges that defendant conspired with others to conduct or to participate in the affairs of the Mexican Mafia's Los Angeles County Jail System ("LACJ") Enterprise through a pattern of racketeering activity, including acts involving murder, extortion, drug trafficking, witness intimidation, witness retaliation, and money laundering.

As set forth in the Indictment, the Mexican Mafia LACJ Enterprise operated for the benefit of the Mexican Mafia member or members deemed by the Mexican Mafia to be in control of the LACJ. The Mexican Mafia LACJ Enterprise operated within LACJ facilities and in some surrounding neighborhoods by imposing the rules of the Mexican Mafia on inmates within LACJ facilities and on members of predominantly Hispanic street gangs. Using the methods of the Mexican Mafia, the Mexican Mafia LACJ Enterprise controlled drug trafficking activities and the distribution of drug trafficking proceeds, extortion, and the enforcement of Mexican Mafia rules (which were used as a basis for extortion) within LACJ custody facilities and in some surrounding neighborhoods.

The Indictment alleges that defendant acted as a facilitator, that is, a highest-level associate, for the Mexican Mafia members who controlled the Mexican Mafia LACJ Enterprise and would act with the authority of those members in directing the criminal activities of the Mexican Mafia LACJ Enterprise, including extortion and drug

1 sales. In particular, the Indictment alleges that defendant would  
2 use his position as an attorney to assist Mexican Mafia Member Jose  
3 Landa-Rodriguez, another now-deceased Mexican Mafia member, and other  
4 co-conspirators, with criminal activities inside and outside the Los  
5 Angeles County Jail System.

6 Defendant is charged in four counts of the Indictment.

7 Count One charges defendant with conspiring to violate the  
8 federal Racketeer Influenced and Corrupt Organizations Act, also  
9 known as "RICO."

10 Count Five charges defendant with conspiring to distribute  
11 methamphetamine, heroin, cocaine, and marijuana. Count Five further  
12 alleges that the overall conspiracy, to which defendant was a member,  
13 involved the following:

14 (1) at least 500 grams of a mixture and substance containing a  
15 detectable amount of methamphetamine;

16 (2) at least 50 grams of methamphetamine;

17 (3) at least 100 grams of a mixture and substance containing a  
18 detectable amount of heroin;

19 (4) cocaine; and

20 (5) marijuana.

21 Count Seven charges defendant with aiding and abetting the  
22 possession with intent to distribute of approximately 7.75 grams of  
23 methamphetamine.

24 Count Eight charges defendant with aiding and abetting the  
25 possession with intent to distribute of approximately 2.37 grams of a  
26 mixture and substance containing a detectable amount of heroin.